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2012 OCT -5 AM 10:31
CLERK U.S. DISTRICT COURT
CENTRAL DIST. OF CALIF.
LOS ANGELES

BY _____

Attorney for NCO Financial Systems, Inc.,

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

GRACE TANG,

Plaintiff,

vs.

NCO FINANCIAL SYSTEMS, INC.,

Does 1-10

Defendant.

Case No.

CV12-8561-maw

NOTICE OF REMOVAL OF ACTION
UNDER 28 U.S.C. § 1441(b)

TO THE CLERK OF THE ABOVE-ENTITLED COURT:

PLEASE TAKE NOTICE THAT defendant NCO Financial Systems, Inc.
("NCO") hereby removes to this Court the state court action described below.

1. This action is a civil action of which this Court has original jurisdiction
under 28 U.S.C. § 1331, and is one which may be removed to this Court by defendant
pursuant to the provisions of 28 U.S.C. § 1441(b) in that it arises under the Telephone
Collection Practices Act, 47 U.S.C. §227, *et. seq.*

1 2. On or about August 29, 2012 the action was commenced in the Superior
2 Court of the State of California, County of Los Angeles, entitled, *Grace Tang v. NCO*
3 *Financial Systems, Inc.*, Case No. 12C03233. A copy of the Plaintiff's Summons and
4 Complaint ("Complaint") is attached hereto as Exhibit A.
5

6 3. The date upon which NCO first received a copy of the said complaint was
7 September 5, 2012, when NCO's agent for service of process was served with a copy of
8 the Complaint.
9

10
11 Dated: 10/3/12

SESSIONS, FISHMAN, NATHAN & ISRAEL, L.L.P.

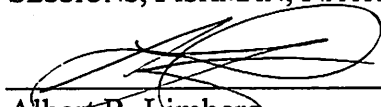
13 
14 Albert R. Limberg
15 Attorney for Defendant
16 NCO Financial Systems, Inc.
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Exhibit A

5253-083020006 2012083013:53 <No Field> Page 2 of 11

SUM-100

SUMMONS
(CITACION JUDICIAL)**NOTICE TO DEFENDANT:**
(AVISO AL DEMANDADO):

NCO Financial Systems, Inc., DOES 1-10

YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):

Grace Tang

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)
CONFORMED COPY
OF ORIGINAL FILED
Los Angeles Superior Court

AUG 29 2012

John A. Clarke, Executive Officer/Clerk
By D. Pirozzi
D. PIROZZI, DEPUTY**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. NOTE: The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **AVISO!** Le han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presente su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 o más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda dasechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Los Angeles Superior Court

Long Beach Courthouse
415 W. Ocean Blvd. Long Beach, CA 90802

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Wade A. Miller 208980, 235 E. Broadway Ste 424, Long Beach, 90802

CASE NUMBER:
(Número del Caso): 12C03233DATE:
(Fecha) JOHN A. CLARKE AUG 29 2011Clerk, by
(Secretario)**D. PIROZZI**, Deputy
(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

NOTICE TO THE PERSON SERVED: You are served

- ☐ as an individual defendant.
- ☐ as the person sued under the fictitious name of (specify):

3. ☒ on behalf of (specify): NCO Financial Systems, Inc.

- under: ☒ CCP 416.10 (corporation) ☐ CCP 416.60 (minor)
☒ CCP 418.20 (defunct corporation) ☐ CCP 416.70 (conservatee)
☐ CCP 416.40 (association or partnership) ☐ CCP 416.90 (authorized person)
☐ other (specify):

- ☐ by personal delivery on (date):

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Wade A. Miller CBN 208980
LAW OFFICES OF WADE A. MILLER
Attorney at Law
235 E. Broadway Suite 424
Long Beach, CA 90802

P: (562) 437-6300
Attorney for Plaintiff
Grace Tang

CONFORMED COPY
OF ORIGINAL FILED
Los Angeles Superior Court

AUG 29 2012

John A. Clarke, Executive Officer/Clerk
By [Signature]
D. PIROZZI, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, LONG BEACH COURTHOUSE

Grace Tang,

Plaintiff,

vs.

NCO Financial Systems, Inc., DOES 1 - 10,

Defendants.

Case No.: 12C03233

COMPLAINT FOR VIOLATION OF
1. CALIFORNIA ROSENTHAL ACT
2. TELEPHONE CONSUMER
PROTECTION ACT
(LIMITED CIVIL)

Plaintiff Grace Tang ("Plaintiff") hereby complains against defendant NCO Financial Systems, Inc., DOES 1 to 10 ("Defendants"), and alleges on information and belief as follows:

OPERATIVE FACTS

1. Beginning in April 2011, Defendants called Plaintiff on her cell phone in an attempt to collect a consumer debt. During these telephone calls, Plaintiff notified Defendant that she did not owe any money and that she disputed the debt.

3 of 11

File By Fax

COMPLAINT

JURISDICTION AND VENUE

11. The Superior Court of California has the jurisdiction over this matter because Plaintiff was damaged in California, County of Los Angeles.

12. Venue is proper in Los Angeles County where Defendant was damaged.

FIRST CAUSE OF ACTION

(Against All Defendants for Violations of the Rosenthal Fair Debt Collection Practices act,
Civil Code § 1788 et. seq.)

13. Plaintiff realleges and incorporates herein by reference each and every paragraph set forth above.

14. The Rosenthal Fair Debt Collection Practices Act, Civil Code § 1788 et seq. (the "RFDCPA") was enacted in 1976 to ensure the integrity of our banking and credit industry. Civil Code § 1788.1(b) . The Legislature found that "unfair or deceptive debt collection practices undermined public confidence which is essential to the continued functioning of the banking and credit system and sound extensions of credit."

15. Civil Code § 1788.17 incorporates by reference sections 1692b to 1692j of Title 15 and shall be subject to the remedies in Section 1692k of Title 15 of the United States Code.

16. Defendants, at all times relevant, were "debt collectors" within the meaning of Civil Code § 1788.2(c) in that they regularly and in the ordinary course of business, on behalf of themselves or others, engaged in acts and practices in connection with the collection of consumer debt.

17. Plaintiff is a "debtor" within the meaning of Civil Code § 1788.2(h) in that Plaintiff is a natural person from whom Defendant sought to collect a consumer debt alleged to be due and owing.

18. Defendants violated 15 U.S.C. 1692e and Civil Code § 1788.17 by attempting to collect a debt by falsely representing the amount of the debt owed.

5 of 11

1 19. In addition, Defendants violated 15 USC 1692g by failing to serve written notice to
2 Plaintiff notifying her that he has a right to dispute the debt.

3 20. Despite Plaintiff demanding that Defendants stop contacting her on multiple occasions
4 via telephone, Defendant harassed Plaintiff by calling her on multiple occasions when in fact no monies
5 were due and owing.

6 21. As a proximate result of Defendants' violations enumerated above, Plaintiff has been
7 damaged in the amount in excess of \$8,000.00.

8 22. Defendants' violation of the RFDCPA were willful and knowing, thereby entitling
9 Plaintiff to statutory damages pursuant to Civil Code § 1788.30(b).

10 23. Plaintiff is entitled to recover reasonable attorneys' fees and costs pursuant to Civil Code
11 § 1788.30(c).

12
13 **SECOND CAUSE OF ACTION**

14 (Against All Defendants for Violations of the Telephone Consumer Protection Act)

15 (47 U.S.C. §227 et. seq.)

16 24. Plaintiff incorporates by reference each and every allegation set forth above.

17 25. 47 U.S.C. §227 of the TCPA provides that it shall be unlawful for any person to (1)
18 make any call to a person on his cell phone using an autodialer in which (2) he is charged for such
19 call other than for (3) emergency purposes or (4) with prior express consent.

20 26. Defendant called Plaintiff on her cell phone using an autodialer.

21 27. Plaintiff was charged for these calls.

22 28. Defendant did not call for an emergency or with express consent.

23 29. Defendant called Plaintiff in excess of 40 times without authorization.

1 30. Plaintiff prays for damages in the amount of \$500 per unauthorized telephone call
2 made using such autodialer.

3 WHEREFORE, Plaintiff prays for relief as set forth below.

4 **PRAYER FOR RELIEF**

5 WHEREFORE, Plaintiff prays for the following relief for all causes of action against all
6 Defendants:

- 7
- 8 1. For compensatory damages;
 - 9 2. For statutory damages in the amount of \$22,000.00;
 - 10 3. For an award for attorneys' fees, costs and expenses incurred in the investigation, filing
11 and prosecution of this action, and
 - 12 4. Such other and further relief as the court may deem just and proper.

13
14
15 Dated: 8/20/2012

By: 

Wade A. Miller
Attorney for Plaintiff

CASE NAME: Grace Tang v. NCO Financial Systems, Inc.
CASE NO: TBD

PROOF OF SERVICE

I, the undersigned, hereby certify that I am a citizen of the United States, over the age of 18 years and not a party to the within action; my business address is 1545 Hotel Circle South, Suite 150, San Diego, California 92108. On this date I served the following:

NOTICE OF REMOVAL OF ACTION UNDER 28 U.S.C. § 1441(b)

☒ BY U.S. MAIL

I served a true and correct copy of the above-named documents by mail by placing the same in a sealed envelope with postage fully prepaid, and depositing said envelope in the U.S. mail at San Diego, California. Said envelope(s) was/were addressed as listed hereafter:

☐ BY FACSIMILIE MACHINE

I caused to be transmitted by facsimile machine a true copy of the above-named documents to the below listed. Attached hereto is the Confirmation Report confirming the status of the transmission.

☐ BY PERSONAL SERVICE

I caused to be served by hand a true copy of the above named document as listed hereafter.

Wade A. Miller, Esq.
235 E. Broadway, Suite 424
Long Beach, CA 90802

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Dated: October 3, 2012



Ann M. Coito

COPY

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

I (a) PLAINTIFFS (Check box if you are representing yourself <input type="checkbox"/>) Grace Tang		DEFENDANTS NCO Financial Systems, Inc.	
(b) Attorneys (Firm Name, Address and Telephone Number. If you are representing yourself, provide same.) Wade A. Miller, Esq. 235 E. Broadway, Suite 424 Long Beach, CA 90802		Attorneys (If Known) Albert R. Limberg, Esq. Sessions Fishman Nathan & Israel, LLP 1545 Hotel Circle South, Suite 150 San Diego, CA 92108	

II. BASIS OF JURISDICTION (Place an X in one box only.) <input type="checkbox"/> 1 U.S. Government Plaintiff <input checked="" type="checkbox"/> 3 Federal Question (U.S. Government Not a Party) <input type="checkbox"/> 2 U.S. Government Defendant <input type="checkbox"/> 4 Diversity (Indicate Citizenship of Parties in Item III)	III. CITIZENSHIP OF PRINCIPAL PARTIES - For Diversity Cases Only (Place an X in one box for plaintiff and one for defendant.) <table style="width:100%; border: none;"> <tr> <td style="width:35%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> <td style="width:35%;"></td> <td style="width:10%; text-align: center;">PTF</td> <td style="width:10%; text-align: center;">DEF</td> </tr> <tr> <td>Citizen of This State</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td style="text-align: center;"><input type="checkbox"/> 1</td> <td>Incorporated or Principal Place of Business in this State</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> <td style="text-align: center;"><input type="checkbox"/> 4</td> </tr> <tr> <td>Citizen of Another State</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td style="text-align: center;"><input type="checkbox"/> 2</td> <td>Incorporated and Principal Place of Business in Another State</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> <td style="text-align: center;"><input type="checkbox"/> 5</td> </tr> <tr> <td>Citizen or Subject of a Foreign Country</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td style="text-align: center;"><input type="checkbox"/> 3</td> <td>Foreign Nation</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> <td style="text-align: center;"><input type="checkbox"/> 6</td> </tr> </table>		PTF	DEF		PTF	DEF	Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4	Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5	Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6
	PTF	DEF		PTF	DEF																				
Citizen of This State	<input type="checkbox"/> 1	<input type="checkbox"/> 1	Incorporated or Principal Place of Business in this State	<input type="checkbox"/> 4	<input type="checkbox"/> 4																				
Citizen of Another State	<input type="checkbox"/> 2	<input type="checkbox"/> 2	Incorporated and Principal Place of Business in Another State	<input type="checkbox"/> 5	<input type="checkbox"/> 5																				
Citizen or Subject of a Foreign Country	<input type="checkbox"/> 3	<input type="checkbox"/> 3	Foreign Nation	<input type="checkbox"/> 6	<input type="checkbox"/> 6																				

IV. ORIGIN (Place an X in one box only.)

☐ 1 Original Proceeding
 ☒ 2 Removed from State Court
 ☐ 3 Remanded from Appellate Court
 ☐ 4 Reinstated or Reopened
 ☐ 5 Transferred from another district (specify):
 ☐ 6 Multi-District Litigation
 ☐ 7 Appeal to District Judge from Magistrate Judge

V. REQUESTED IN COMPLAINT: JURY DEMAND: ☐ Yes ☒ No (Check 'Yes' only if demanded in complaint.)

CLASS ACTION under F.R.C.P. 23: ☐ Yes ☒ No
 MONEY DEMANDED IN COMPLAINT: \$ 22,000.00

VI. CAUSE OF ACTION (Cite the U.S. Civil Statute under which you are filing and write a brief statement of cause. Do not cite jurisdictional statutes unless diversity.)

Telephone Collection Practices Act 47 USC 227 et seq.

VII. NATURE OF SUIT (Place an X in one box only.)

OTHER STATUTES <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce/ICC Rates/etc. <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input checked="" type="checkbox"/> 480 Consumer Credit <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 810 Selective Service <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 875 Customer Challenge 12 USC 3410 <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Act <input type="checkbox"/> 892 Economic Stabilization Act <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 894 Energy Allocation Act <input type="checkbox"/> 895 Freedom of Info. Act <input type="checkbox"/> 900 Appeal of Fee Determination Under Equal Access to Justice <input type="checkbox"/> 950 Constitutionality of State Statutes	CONTRACT <input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loan (Excl. Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	TORTS PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Fed. Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury-Med Malpractice <input type="checkbox"/> 365 Personal Injury-Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 463 Habeas Corpus-Alien Detainee <input type="checkbox"/> 465 Other Immigration Actions	TORTS PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability BANKRUPTCY <input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 CIVIL RIGHTS <input type="checkbox"/> 441 Voting <input type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 444 Welfare <input type="checkbox"/> 445 American with Disabilities - Employment <input type="checkbox"/> 446 American with Disabilities - Other <input type="checkbox"/> 440 Other Civil Rights	PRISONER PETITIONS <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General Habeas Corpus <input type="checkbox"/> 535 Death Penalty <input type="checkbox"/> 540 Mandamus/Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition FORFEITURE / PENALTY <input type="checkbox"/> 610 Agriculture <input type="checkbox"/> 620 Other Food & Drug <input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 630 Liquor Laws <input type="checkbox"/> 640 R.R. & Truck <input type="checkbox"/> 650 Airline Regs <input type="checkbox"/> 660 Occupational Safety /Health <input type="checkbox"/> 690 Other	LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Mgmt. Relations <input type="checkbox"/> 730 Labor/Mgmt. Reporting & Disclosure Act <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Empl. Ret. Inc. Security Act PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 840 Trademark SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS-Third Party 26 USC 7609
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CV12-8561

FOR OFFICE USE ONLY: Case Number: _____

AFTER COMPLETING THE FRONT SIDE OF FORM CV-71, COMPLETE THE INFORMATION REQUESTED BELOW.

UNITED STATES DISTRICT COURT, CENTRAL DISTRICT OF CALIFORNIA
CIVIL COVER SHEET

VIII(a). IDENTICAL CASES: Has this action been previously filed in this court and dismissed, remanded or closed? ☒ No ☐ Yes

If yes, list case number(s): _____

VIII(b). RELATED CASES: Have any cases been previously filed in this court that are related to the present case? ☒ No ☐ Yes

If yes, list case number(s): _____

Civil cases are deemed related if a previously filed case and the present case:

- (Check all boxes that apply) ☐ A. Arise from the same or closely related transactions, happenings, or events; or
☐ B. Call for determination of the same or substantially related or similar questions of law and fact; or
☐ C. For other reasons would entail substantial duplication of labor if heard by different judges; or
☐ D. Involve the same patent, trademark or copyright, and one of the factors identified above in a, b or c also is present.

IX. VENUE: (When completing the following information, use an additional sheet if necessary.)

- (a) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named plaintiff resides.
☐ Check here if the government, its agencies or employees is a named plaintiff. If this box is checked, go to item (b).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
Long Beach, CA	

- (b) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH named defendant resides.
☐ Check here if the government, its agencies or employees is a named defendant. If this box is checked, go to item (c).

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country
	Horsham, PA

- (c) List the County in this District; California County outside of this District; State if other than California; or Foreign Country, in which EACH claim arose.
Note: In land condemnation cases, use the location of the tract of land involved.

County in this District:*	California County outside of this District; State, if other than California; or Foreign Country

* Los Angeles, Orange, San Bernardino, Riverside, Ventura, Santa Barbara, or San Luis Obispo Counties

Note: In land condemnation cases, use the location of the tract of land involved

X. SIGNATURE OF ATTORNEY (OR PRO PER): _____

Date _____

10/3/12

Notice to Counsel/Parties: The CV-71 (JS-44) Civil Cover Sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law. This form, approved by the Judicial Conference of the United States in September 1974, is required pursuant to Local Rule 3-1 is not filed but is used by the Clerk of the Court for the purpose of statistics, venue and initiating the civil docket sheet. (For more detailed instructions, see separate instructions sheet.)

Key to Statistical codes relating to Social Security Cases:

Nature of Suit Code	Abbreviation	Substantive Statement of Cause of Action
861	HIA	All claims for health insurance benefits (Medicare) under Title 18, Part A, of the Social Security Act, as amended. Also, include claims by hospitals, skilled nursing facilities, etc., for certification as providers of services under the program. (42 U.S.C. 1935FF(b))
862	BL	All claims for "Black Lung" benefits under Title 4, Part B, of the Federal Coal Mine Health and Safety Act of 1969. (30 U.S.C. 923)
863	DIWC	All claims filed by insured workers for disability insurance benefits under Title 2 of the Social Security Act, as amended; plus all claims filed for child's insurance benefits based on disability. (42 U.S.C. 405(g))
863	DIWW	All claims filed for widows or widowers insurance benefits based on disability under Title 2 of the Social Security Act, as amended. (42 U.S.C. 405(g))
864	SSID	All claims for supplemental security income payments based upon disability filed under Title 16 of the Social Security Act, as amended.
865	RSI	All claims for retirement (old age) and survivors benefits under Title 2 of the Social Security Act, as amended. (42 U.S.C. (g))